

# KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

3508 Albemarle Street, NW

Washington, DC 20008

202.363.1263

[kpsconsulting@starpower.net](mailto:kpsconsulting@starpower.net)

---

May 23, 2007

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Ex Parte Presentation  
WC Docket No. 04-36  
WT Docket No. 96-198

Dear Ms. Dortch:

On May 21 and May 22, 2007, the undersigned of the Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA) had separate conversations with Ian Dillner of the office of Chairman Martin and Scott Deutchman of the office of Commissioner Copps about the need to ensure that people with hearing loss continue to have the ability to communicate with each other in real-time text over a VoIP system. It would be helpful if the upcoming VoIP order explained the following:

As we move from PSTN to VoIP we need reliable real-time text capability that is supported throughout the VoIP system so that people who rely on text and text inter-mixed with speech in order to converse can use the next generation phone system.

Some background:

As the migration from the PSTN to VoIP communications has taken place, voice users have had the comfort of knowing that they can continue communicating in real-time with anyone else who is using the PSTN or using another VoIP service. This is because market pressures have ensured that voice users can communicate with each other seamlessly. However individuals with disabilities who have been relying on TTYs to communicate

over the PSTN do not have the same guarantee that they will be able to continue communicating in real-time text (alone or intermixed with voice) over VoIP within and across VoIP services. Market forces have not been strong enough to ensure that real-time text users on different services can communicate with each other. This is a problem for the many text users who have left the PSTN completely to obtain the many advantages of broadband IP networks, such as IP-enabled relay services. This problem may also be a stumbling block for implementation of direct access into IP 9-1-1 for text users, regardless of whether they use broadband, wireless, or the PSTN. As part of the obligation to comply with the new accessibility requirements, a standard form of interoperable conversational IP text that provides a reliable end-to-end communication path for traversing within and between the PSTN and VoIP networks will be needed, where readily achievable.

Sincerely,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss  
Legal Consultant, RERC-TA

cc: Ian Dillner  
Scott Deutchman  
Cathy Seidel